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10 *Attorneys for Plaintiff Righthaven LLC*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

29 Righthaven LLC, a Nevada limited-
30 liability company,

31 Plaintiff,
32 v.

33 GARRY NEWMAN, an individual; and
34 FACEPUNCH STUDIOS LTD., a limited
35 company formed under the laws of Great
36 Britain,

37 Defendants.

38 Case No.: 2:10-cv-01762-JCM-PAL

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1 in the previous submission, due to the close friend and client's hospitalization, Righthaven's
2 counsel has been required to be away from his office until late in the evening and then required
3 to return to the hospital for a large portion of the following day. (Doc. # 27 at 2.) Defendant's
4 counsel did not oppose the request for an extension of time. (Doc. # 28.) The Court
5 subsequently granted the request for extension of time. (Doc. # 29.)

6 Unfortunately, counsel's friend and client remained hospitalized and under emergency
7 room care until late yesterday evening. Counsel then was asked to help assist with medical and
8 other in-home transitional needs for this individual for the remaining portion of Thursday
9 evening and until late Friday evening. In view of these events, which were unexpected, counsel
10 has diligently attempted to meet the ECF deadline for Righthaven's response pursuant to the
11 extension of time previously granted, but simply cannot do so. What actions counsel has been
12 able to perform for Righthaven and for other clients have been done late into the evening given
13 his need to help his friend and client and his family. Righthaven's counsel anticipates having a
14 response to the Motion on file likely before the Court has a chance to consider this second
15 requested extension of time, but said filing should be made no later than Monday, August 29,
16 2011.

17 As with the prior requested extension, the foregoing unexpected events have prevented
18 counsel from preparing a response to the Motion by the time set forth in the extension of time
19 entered by the Court. Moreover, these unexpected events have prevented counsel from
20 attempting to secure a stipulation for the requested extension of time because counsel has been
21 away from his office and working as best possible on a remote basis. Righthaven consents to
22 Defendant being given an additional extension of time to file a reply to the response should this

1 requested continuance be granted. This requested extension of time is sought in good faith and
2 not for the purposes of delay.

3 Dated this 19th day of August, 2011.

4 SHAWN A. MANGANO, LTD.

5 By: /s/ Shawn A. Mangano, Esq.
6 SHAWN A. MANGANO, ESQ.
7 Nevada Bar No. 6730
8 shawn@manganolaw.com
9 9960 West Cheyenne Avenue, Suite 170
10 Las Vegas, Nevada 89129-7701
11 Tel.: (702) 304-0432
12 Fax: (702) 922-3851

13 *Attorney for Plaintiff Righthaven LLC*

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16 IT IS SO ORDERED:
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20 UNITED STATES DISTRICT JUDGE
21 DATED: _____

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 19th day of August, 2011, I caused **PLAINTIFF RIGHHAVEN LLC'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT GARRY NEWMAN'S MOTION TO DISMISS THE FIRST AMENDED COMPLAINT FOR LACK OF SUBJECT MATTER JURISDICTION AND LACK OF PERSONAL JURISDICTION (Second Request)** to be served by the Court's CM/ECF system.

By: /s/ Shawn A. Mangano
Shawn A. Mangano, Esq.
SHAWN A. MANGANO, LTD.